

1           A           I think so.

2           Q           All right. We're addressing this time frame  
3 with regard to the programming of Channel 51. That is from  
4 1989 to 1994. Technically, August 1 of '89 to August 1 of  
5 '94, but I don't -- that's kind of hard to cut it that fine.  
6 That five year period. And if it helps you, that was a --  
7 during that five year period, the station was an affiliate of  
8 the Home Shopping Network.

9           A           Yes.

10          Q           During that time frame, did you have a TV set in  
11 your house?

12          A           Yes, I did.

13          Q           And did you have a TV set in your office here in  
14 Reading?

15          A           No.

16          Q           Okay.

17          A           No distractions for the office.

18          Q           Quantify for us, if you will, how much time  
19 you've had available during that time frame to watch TV and  
20 the kinds of TV programming that you would watch when you did  
21 have time.

22          A           The schedule that I have affords me not a lot of  
23 time to be in front of the TV, although four, five hours,  
24 maybe, a week of TV viewing.

25          Q           And the types of programs that would get your

1 attention during -- when you had time to watch?

2 A Sports and nature.

3 Q Sports, and I didn't hear the word.

4 A Nature. Nature type movies and gardening.

5 Q I'm tempted to discuss the Sports Fair for the  
6 last 26 years.

7 A We had to do some fancy foot work to keep our  
8 teams in Pennsylvania.

9 Q You remember the days when you had Sonny  
10 Jerguson?

11 A Yes. Yes, I do. Oh, yeah.

12 Q Did you watch -- at least spend some of your  
13 time watching television news coverage?

14 A Yes. And my ex-wife. That and the buy  
15 channels, as I call them. The ad channels where they sell  
16 merchandise, you know.

17 Q Did you watch Channel 51 during that time frame  
18 when they were telecasting Home Shopping Network as well as  
19 other stuff?

20 A Yes. My wife did. My ex-wife did.

21 Q Okay. When you wanted to see news, what  
22 stations would you watch?

23 A Normally it would be the major stations; 3, 6,  
24 8, 10 and once in awhile the local stations when they would  
25 have various interesting topics on, news topics.

1           Q       By local station are you talking about the cable  
2 station - - -

3           A       Yes. Cable station.

4           Q       We're here and you're here for you to share with  
5 us your experiences in this five year period of programming  
6 which Channel 51 telecast that is of service to the community  
7 of Reading in which you participated or of which you have  
8 knowledge. And we're finding that it's quite efficient for  
9 Mr. Hutton to commence the questioning. He has an exhibit  
10 which helps us get along. Okay?

11          A       Certainly.

12                   MR. HUTTON: I'd like to have this marked as  
13 Caltagirone Exhibit 3.

14                   (Whereupon, the Reporter marked Caltagirone  
15 Exhibit No. 3 for identification, Programs/Issues Reports 3rd  
16 Quarter 1989 - 3rd Quarter 1994.)

17 BY MR. HUTTON:

18          Q       Mr. Caltagirone, this is a document you've not  
19 seen before. It consists of excerpts of WTVE's quarterly  
20 issues and programs reports beginning on the first quarter of  
21 1994 and I believe ending in the third quarter of 1994. If  
22 you will flip to the third page of that document there's a  
23 description of a program with the title Legislative Journal,  
24 Representative Caltagirone.

25          A       Yes.

1 Q Do you recall that program?

2 A Yes. Yes. I still record that each month.

3 Q Okay.

4 A Yes.

5 Q And can you describe the program for me?

6 A It's a summary of legislative events that occur  
7 each month in the state legislature in Harrisburg; the issues  
8 that we deal with, the legislation that we vote on, current  
9 updates, my committee activities, and other activities in the  
10 community that I've participated in.

11 Q And what's the format of the show?

12 A We film that in Harrisburg in the -- in our  
13 studio up there. And it's a question and answer and the  
14 dialogue and then we also put in excerpts of floor debate,  
15 news conferences and other types of activities that are taking  
16 place in and around the Capitol. We then package that and  
17 send that to various TV stations for use by them.

18 Q And locally, is there any TV station other than  
19 WTVE that carried that show in 1994?

20 A I'm trying to recall if Channel -- it would be  
21 Berks Cable. That's just been sold to Time Warner. Now  
22 that's been sold. But yes, they -- they used to have that. I  
23 don't recall the channel number at the time that they used to  
24 run it on Berks Cable also. Yes. Those two, TV 51 and that  
25 one; and just recently, within the last two or three years,

1 the public access channel that's in downtown Reading. So,  
2 yes, they -- but TV 51 used to run mine regularly. Yes.

3 Q And did that program begin in 1994 or had it  
4 begun earlier?

5 A Chris Sarig and I, my interviewer, she runs the  
6 TV production up there. Her and I have been together, I  
7 guess, for almost 20 -- 20, 23 years. About 20 years we've  
8 been doing it.

9 Q Okay. Turning now to the sixth page of the  
10 document, this is in the second quarter of 1994, and beginning  
11 on that page and following for the next two pages, there's a  
12 narrative under the heading of -- it's called Issue:  
13 Government. And there's a narrative there I'd like you to  
14 review and tell me if you recall the programs that are  
15 described there or if you recall - - -

16 A Yes.

17 Q - - - the station's airing those types of  
18 programs.

19 A Yes, I do, as a matter of fact. Those were  
20 public service type announcements that I had filmed for the  
21 issues that are raised here with the children, WIC, the  
22 Forgiveness, and of course that was our Democratic Broadcast  
23 Service program here (indicating) in Legislative Journal.

24 Q Okay. Is Legislative Journal something  
25 different than the program that we described earlier?

1           A       No. No, that -- that's the journal that gives  
2 the summaries of the activities - - -

3           Q       Okay.

4           A       - - - in Harrisburg and around the state.

5           Q       And one of the programs is listed with the title  
6 State House Perspectives. Is that something different, to  
7 your knowledge?

8                   MR. BECHTEL: Counsel, I don't see that.

9                   MR. HUTTON: That's - - -

10                  THE WITNESS: What page?

11                  MR. HUTTON: - - - at the top of the second page  
12 of the narrative.

13                  THE WITNESS: Oh, I see it. That would be the  
14 Republican -- that would be the Republican video that would  
15 have been used. I think they shared equally both -- both  
16 parties, Democrats and Republicans. And that's their --  
17 that's their production that would be used on the TV shows.

18 BY MR. HUTTON:

19           Q       Okay. Now, the first page at the narrative --  
20 first page after the narrative has a Certification of  
21 Affidavit Performance Report, and that refers to Nation's  
22 Update 1, a public service announcement with a four minute  
23 length. Does that mean anything to you?

24           A       Yes. I recall that I did participate in  
25 different public service announcements that I filmed out at

1 the station on various occasions.

2 Q And what topics were covered typically?

3 A It was a myriad of issues, as I recall. It  
4 involved some of those children issues, what was available for  
5 children, WIC, the Women, Infants and Children. It -- it  
6 covered a gamut of various type services that would be  
7 available at the state and the local level through state  
8 funding.

9 Q And do you recall seeing any of those public  
10 service announcements aired on the station?

11 A Oh, yes. Yes. Yes.

12 Q You saw them regularly?

13 A Yes. My wife used to tell me about them  
14 because, when she was watching the station and buying  
15 different things, she would comment about me being on there.

16 Q Favorably, no doubt?

17 A Oh, yes. Yes. Uh-huh. I thought she was going  
18 to buy me.

19 Q The next page refers to Nation's Update 2 with a  
20 90 second length and those appear to be public service  
21 announcements as well. Would those be similar in nature?

22 A Yes.

23 Q And the third page refers to Nation's Update 3,  
24 also with a 90 second length public service announcements.  
25 Would those be similar in nature?

1           A           Yes.

2           Q           As you go through the next several pages, there  
3 appear to be references to legislative report programs  
4 appearing approximately once a week on the station. Is that  
5 consistent with your recollection?

6           A           Absolutely. And I notice, as a matter of fact,  
7 these are all Representatives that I still serve with, Dante  
8 Santoni, Sheila Miller, Sam Rohrer, Dave Argal, Kevin Blaum.  
9 They're still all currently serving. And they're all friends  
10 of mine. And they are all from Berks County. Kevin, of  
11 course, is from Wilkes-Barre. And Mike Veon is from Beaver  
12 County. Mike is our -- one of our leaders in the House.  
13 Kevin took over my committee as Judiciary Chair. But Sam  
14 Rohrer is from Berks also. Yes. They are all -- and those  
15 were their programs, as a matter of fact. They're Republican,  
16 Dante and I are both Democrats; so they've had a mix of both  
17 Republican and Democrat shows.

18          Q           Okay. How about Representatives Veon and Blaum?

19          A           Representative Mike Veon, he was chair of our  
20 policy committee and he is now the Whip, and Kevin Blaum was  
21 former chairman of Aging and Youth. He's now chairman of  
22 Judiciary. Blaum is from Wilkes-Barre, Pa. And Mike is from  
23 Beaver County, Pa. And they did shows, of course, on  
24 different types of public service issues that were very  
25 appropriate for the time and -- I was just looking on the

1 issues that they were discussing there, and they -- they would  
2 also have time that would be allocated on issues that they  
3 would send out. It was a 28.30 minute program evidently that  
4 -- similar to what we were doing that they were airing.

5 Q And apart from the cable channel, do you recall  
6 any other television station providing this type of coverage  
7 of local political issues?

8 A None. And to be perfectly honest, it disturbed  
9 many of us in the legislature, except for 51 and the cable  
10 channel, that we really did not have access to any of the  
11 other channels to get our message across as it concerned  
12 public issues and/or public services that were available.  
13 They just did not make it available on a timely basis for  
14 information purposes.

15 Q All right. I'd like to move on now to the third  
16 quarter of 1994. And I'd like you to review the narrative  
17 that appears on the pages that follow that cover page and ask  
18 you if these narrative descriptions are consistent with your  
19 recollection of the station's programming during that time  
20 frame.

21 A Um-hum.

22 (Witness reviewed document.)

23 Yes. Very much so. I remember one in  
24 particular, it was the first time in 183 years we impeached a  
25 sitting Supreme Court Justice and that was Judge Rolf Larsen

1 and that one I definitely remember. And I was chairman of the  
2 judiciary, first time that's happened, like I said, in 183  
3 years. And then we handled the -- I was one of the House  
4 Managers that handled the impeachment trial in the Senate.

5 Q All right. Again, looking at the certifications  
6 that follow, would you say that it appears that the station  
7 aired a legislative report approximately weekly?

8 A Yes, it did.

9 Q And that's consistent with your recollection  
10 from that time frame?

11 A Yes. Yes. As I -- as I'm reviewing this  
12 material, yes, it certainly was.

13 Q In the first of those sheets is a reference to  
14 Representative Dan Surra and Representative Thaddeus Kirkland.

15 A Yes.

16 Q Do you know who they are?

17 A Yes. They're still current members of the House  
18 of Representatives.

19 Q Are they from this area?

20 A Danny Surra is from the western part of the  
21 state, it might be Clinton County. Thaddeus Kirkland is from  
22 Delaware County, city of Chester.

23 MR. BECHTEL: For the record, counsel, anything  
24 after August 1 of '94 we'll move to strike, as you know.

25 MR. HUTTON: Sure.

1 BY MR. HUTTON:

2 Q And would you describe for me your sense of the  
3 -- of television station WTVE's record of public service  
4 during the 1989 to 1994 time frame?

5 A I -- I felt that they did an exemplary job of  
6 allowing public access for the governmental shows and programs  
7 that we had produced, both Democrats and Republicans I might  
8 add, in Harrisburg. Because they were very fair to the  
9 representatives in this area, allowing that much time on their  
10 station to inform the citizens back here in Berks County, and  
11 the public service announcements also. Because tied in with a  
12 lot of these programs are programs that are available to  
13 people throughout the entire Commonwealth and updates about  
14 those programs that are available, which are very important to  
15 the local people, to know about that. Because the newspaper  
16 doesn't put all that stuff in. They're very limited in space.  
17 But the TV gave everybody pretty much fair access to just  
18 about anything they wanted to say and what they wanted to get  
19 across in that time frame that was allotted for their  
20 programs.

21 MR. HUTTON: Great. Thank you very much.

22 THE WITNESS: Certainly.

23 BY MR. BECHTEL:

24 Q You mentioned -- you referred to our studios in  
25 Harrisburg.

1           A           Yes, sir.

2           Q           What studios were you talking about?

3           A           The Democrats and the Republicans both have  
4 their own production TV studios where a room like this is set  
5 up and it's maintained full time for production purposes for  
6 shows that we tape, we manufacture them - - -

7           Q           Sure.

8           A           - - - in-house and then they send those back to  
9 the local stations for use by them. And we -- and I think  
10 it's pretty much record there that all of the representatives  
11 do those shows and then they send them back here locally for  
12 viewing purposes.

13          Q           How many representatives are there?

14          A           In Berks County, we have -- we have five full  
15 State Representatives and two partials. Because -- because of  
16 reapportionment, with our population, we -- we have seven  
17 representatives that represent parts of Berks County, five  
18 full and two partials. And we also have three State Senators,  
19 one fully Berks, the other two -- the one represents eastern  
20 (sic) Berks County and all of Lebanon and part of Lancaster.  
21 And the other, Jimmy Gerlock, who is a former -- he served on  
22 my Judiciary Committee, former House member, he covers parts  
23 of southern Berks and then goes into Montgomery and parts of  
24 Chester. But there's a total of ten actually that cover Berks  
25 County for the last ten years.

1           Q           Now this is not a test, but how many --  
2 approximately how many State Representatives are in the  
3 greater Philadelphia area not counting Reading?

4           A           Not counting Reading? Okay. I can pretty well  
5 -- that would be Democrats and Republicans, of course.

6           Q           Sure.

7           A           Close to 60 I'd say.

8           Q           I didn't hear.

9           A           Close to 60 in the greater Philadelphia,  
10 including Philadelphia area. Yes. Out of 203 total in the  
11 House. I might add, if I could, - - -

12          Q           Sure. Please.

13          A           - - - Philadelphia does not, to the best of my  
14 knowledge, with all their media, does not provide very much  
15 access for the largest number of representatives in the House,  
16 and that's the city of Philadelphia. Not like we get in other  
17 parts of the state. Berks County particularly provides very  
18 good access for coverage. There are some members around the  
19 Commonwealth, both Democrats and Republicans, that have no  
20 outlets for getting messages across like we do.

21          Q           Okay. Now, let's go back to the beginning of  
22 this exhibit.

23          A           Yes, sir.

24          Q           And you said how long you've been producing a  
25 program from Harrisburg, and I forget how long you said.

1           A           It's at least or over 20 years.

2           Q           Over 20 years?

3           A           Yes, sir.

4           Q           And do you recall when Channel 51 commenced the  
5 carriage of your program? It's been on the air since 1980.

6           A           Oh, geez. Now, you're testing my memory. The  
7 later -- latter part of the '80s. I'd say somewhere in there.  
8 Yes. Somewhere in the latter part of the '80s when it would  
9 have started. I can't remember, excuse me, specifically the  
10 date.

11          Q           Yeah, I know -- I'm not trying to test you  
12 specifically. They have logs and - - -

13          A           Um-hum.

14          Q           - - - presumably our record will reflect the  
15 times that were covered - - -

16          A           Um-hum.

17          Q           - - - that were carried during the five year  
18 term. Okay. Now, let's start with the Legislative Journal,  
19 and I'm going to the first page that had that, which is the  
20 third page in, and that's where we started this odyssey that  
21 you enjoyed with Mr. Hutton. How often do you produce the  
22 Legislative Journal -- did you produce during the five year  
23 term we're talking about, to the extent you can place it?

24          A           I've been very consistent with that. It would  
25 be once a month, every month.

1 Q I'm sorry?

2 A Once a month, every month, 12 months a year.

3 Q And is the legislature in session generally how  
4 long in a year?

5 A We are -- in Pennsylvania we are considered a  
6 full-time legislature. We normally are serving between 110  
7 and 120 or 130 days a year in session.

8 Q Would you - - -

9 A And that doesn't include committee business;  
10 committee hearings and meetings.

11 Q That's the only way it should be done, isn't it?

12 A Yes, sir.

13 Q Now, we move over a couple of pages past the  
14 cover sheet for the second quarter and we go to where it says,  
15 Number 16 Issue: Government, and now we start talking about a  
16 whole bunch of program type things.

17 A Yes.

18 Q Okay. Bear with me. My arteriosclerotic mind  
19 takes a little while to get this all squared away.

20 It says House of Democratic Broadcast Services,  
21 Legislative Journal. When it says Legislative Journal, that's  
22 you?

23 A Yes, sir.

24 Q And it suggests that you are a Democrat?

25 A Yes, sir.

1 Q And what area does Representative Santoni  
2 represent?

3 A He represents -- I represent 16 wards in the  
4 city, and that's all city. Santoni represents three wards in  
5 the city and then he goes out into the boroughs, the suburbs,  
6 townships; Muhlenberg, Temple, Laureldale, Alsace, Lower  
7 Alsace, Mt. Penn, Bern Township. That's his district.

8 Q Is Temple where the restaurant is just down the  
9 road that I go to every morning about 3 o'clock?

10 A Yes. That's it. You got it.

11 Q Okay. The next Legislative Journal is Bruce  
12 Grim. Who is Bruce Grim?

13 A He is the director of the Juvenile Probation  
14 Department of Berks County.

15 Q Now we have a Republican video called State  
16 House Perspectives. And are those local area persons on that  
17 particular show? Do you recognize those names?

18 A I recognize all of the names. Easy Taylor, I  
19 call her. It's Eleanor Taylor. She's a Republican member  
20 from Chester County. And she's now a chair in her own right.  
21 Tommy Ganan was my counterpart on the Judiciary Committee,  
22 Republican, from Delaware County. We worked together for ten  
23 years. And Nick McKozie is from also Delaware County, and  
24 he's chairman of the House Insurance Committee. They're now  
25 all chairman but they're all Republicans but all good friends

1 of mine.

2 Q Does Ms. Taylor have a show that she produces?

3 A Yes. Yes, she does.

4 Q And do you know, is it carried by the station in  
5 her district?

6 A I'll tell you the truth, I think that -- and  
7 that's what I had said previously. Not all are treated  
8 equally. In many, and as I recall even in Chester County at  
9 this time frame, they did not, in fact, carry programs.  
10 That's why a lot of the programs were being carried by  
11 stations that would accept programs that were being produced  
12 in Harrisburg. At that time I do not think either Chester nor  
13 Delaware were probably carrying these videos, at this time  
14 frame.

15 Q Do - - -

16 A It may have changed.

17 Q I'm sorry, I - - -

18 A Go ahead.

19 Q - - - did not mean to interrupt at all.

20 A Certainly, sir.

21 Q Of the 60 delegates in the Philadelphia area,  
22 approximately - - -

23 A Yes, sir.

24 Q - - - do a lot of them have their shows produced  
25 down in Harrisburg, too?

1           A           Those that are able to get them aired. I dare  
2 say that at this time frame, and it may have changed but I  
3 don't think so, in Philadelphia -- particularly the  
4 Philadelphia area, the TV stations down there do not and did  
5 not give them access and almost, to a person, Democrats and  
6 Republicans in Philadelphia did not do TV shows specifically  
7 because they could not get them aired in Philadelphia.

8           Q           And so they didn't prepare the program?

9           A           They didn't do them. No. True.

10          Q           The 60 delegate - - -

11          A           No, not all 60. I'm saying in the Philadelphia  
12 - - -

13          Q           Help me with that.

14          A           In the Philadelphia area you may have, of the  
15 60, approximately half of them are from Philadelphia. About  
16 30.

17          Q           Okay.

18          A           About 25 Democrats and five Republicans. That's  
19 about -- the 30 outside the Philadelphia area, I'm talking  
20 about Montgomery County, Delaware, maybe parts of Chester.  
21 Even if you come over to Lancaster. Most of them had  
22 difficulty even getting things aired in their particular  
23 counties. That was not the case in Berks County, though. I  
24 think we were ahead of the edge in allowing members access  
25 like we've had. And we've had it here for some time. And

1 I've complained as a representative that these other stations  
2 outside of our area really should give them access time on  
3 their stations.

4 Q I'm going to try one more time.

5 A Certainly.

6 Q Of the 60 -- approximately 60 delegates in the  
7 Philadelphia area, - - -

8 A Yes, sir.

9 Q - - - are there some delegates who produce their  
10 own program?

11 A Yes.

12 Q Do you have any notion as to how many or the  
13 proportion that produce their own program?

14 A Of the 60, I'd say there may be 20 -- 15 to 20  
15 that produce their own programs, out of that number, in  
16 Harrisburg.

17 Q I understand.

18 A In Harrisburg.

19 Q The same parallel we're talking about. Okay?

20 A Sure.

21 Q Now, what do they do with those programs? Who  
22 do they send them to?

23 A They would send them to stations that would  
24 accept them and run them as public service. Because they  
25 would be speaking on different issues that they're familiar

1 with.

2 Q Okay. All right. So there are stations,  
3 television stations, in Philadelphia that do carry the  
4 programs produced by delegates from Philadelphia that elect to  
5 send them the tapes; is that correct?

6 A No, it isn't.

7 Q I'm sorry?

8 A No.

9 Q That's not correct?

10 A No, it isn't.

11 Q All right. Then I misunderstood your answer.  
12 Start over again.

13 A The - - -

14 Q Now wait. I'm sorry, sir.

15 A Okay.

16 Q Approximately how many of the 60 -- this is a  
17 repetition. Approximately how many of the 60 delegates in  
18 Philadelphia area produce these programs down in Harrisburg  
19 and send them out?

20 A 15 or 20, roughly.

21 Q And approximately how many, to your knowledge,  
22 of the 15 or 20 who send out their programs have their  
23 programs telecast by somebody?

24 A All 15 or 20 would have them broadcast in Berks  
25 County when they would send them to Berks County. Whether it

1 was TV 51 or possibly 5. They did run them.

2 Q Ah. And, to your knowledge, did some of them  
3 have those programs that they produced in Harrisburg carried  
4 on a cable channel?

5 A PCN would cover live floor debate and press  
6 conferences. They -- and their policy to this day is that  
7 they will not and do not run any particular member House or  
8 Senate -- we have 50 State Senators and 203 House members.  
9 None of them have any dedicated programs on the PCN channel  
10 for themselves.

11 Q The 15 to 20 delegates in the Philadelphia area,  
12 are you counting Berks County in that?

13 A Oh, yes. I would count Berks County.

14 Q You're counting yourself in there?

15 A Yes. I'd count myself.

16 Q Oh. Now -- now, that's helping me with my  
17 arithmetic.

18 A Yes. When I say the media market -- if I know  
19 where you're coming from, the signals out of Philadelphia  
20 bleed into our area.

21 Q Okay.

22 A Our signals do not bleed into their area because  
23 we don't cover that much of the Philadelphia market. Our  
24 signals aren't as strong to get down all the way into the  
25 heart of the Phila -- Philadelphia, as an example. We cover

1 the Reading/Berks metropolitan area. And when I look at the  
2 southeast with Philadelphia and then outside of Philadelphia,  
3 which would be -- just coming up, the counties that would butt  
4 down from Berks County, Berks, Montgomery, Chester and a piece  
5 of Delaware, if you go over to the west, you'll start to get  
6 into Lancaster and the Pennsylvania Dutch country over there,  
7 but I'm looking at the corridor right here from Philadelphia  
8 up to Berks.

9 Q Now, you and your colleagues, I assume, have  
10 observed this phenomenon for some time, that is to say that  
11 the Philadelphia stations are less eager to carry the  
12 Harrisburg produced programs then let's say the Reading  
13 station, okay?

14 A Yes, sir.

15 Q And as you've observed that, have you formed  
16 some -- an opinion as to why that is the case?

17 A We've complained -- and not just me but other  
18 representatives, particularly from that media market -- over  
19 the years, that the media in Philadelphia was very, very  
20 selective as to who they would or what they would run. And  
21 Philadelphia is like another state even though it's part of  
22 our state. The media people in Philadelphia were, and I think  
23 still are to a large degree, extremely reluctant to provide  
24 the kind of access that many of the outlying counties provide  
25 for public service. And we consider it public service type

1 information that we share with our viewers and our  
2 constituents. That's a management decision, evidently, down  
3 in the Philadelphia market. Which we are not part of, I might  
4 add. We're not really a big part of that. I'm talking about  
5 Philadelphia based stations now.

6 Q In fairness to management's decisions, in your  
7 consideration of this phenomenon, I'll call it, about this  
8 fact of life, let's put it that way, is part of the  
9 consideration the fact that a TV station in Philadelphia is  
10 beaming its signal to jurisdictions that have some 60  
11 delegates, whereas perhaps some of the more outlying stations  
12 are more locally oriented in their coverage and their audience  
13 structure? Do you -- did you follow that?

14 A Yes.

15 Q Is that an element of -- that comes into play,  
16 in your opinion?

17 MR. HUTTON: I'm going to object to the question  
18 in that it asks him to speculate as to someone else's state of  
19 mind.

20 BY MR. BECHTEL:

21 Q Oh, Lord. You can answer the question. We'll  
22 argue about that in Washington.

23 A I would think possibly that even the reverse of  
24 that may be true.

25 Q I'm sorry?

1           A           I think the reverse of that may be even true.

2           Q           Okay.

3           A           In this neck of the woods, we've always had an  
4 open door policy for trying to get information out to people.  
5 In the big media areas, Washington included as well as  
6 Philadelphia, they are extremely, I think -- and I -- you  
7 know, I've been in office 23 years, have gone through 12 major  
8 elections, and I've been involved in a lot of other campaigns,  
9 both national and local. And they do not treat everybody  
10 equally. They really don't. I just feel, you know,  
11 personally, that they want the bucks for advertising. And I  
12 can understand that. I can't appreciate it as a public  
13 official or as somebody that feels that they should have more  
14 open access to public service, whether it's elected officials,  
15 at least a time frame where they can present their case to the  
16 public on various issues, especially office holders.

17          Q           Okay.

18          A           They're big media markets. Their buy-time down  
19 there is a heck of a lot more expensive than most other areas,  
20 except out in the Pittsburgh area. They don't like to give up  
21 their time free.

22          Q           I assume that all of the carriage of your  
23 programs has been free?

24          A           Oh, it is. Yes. Yes. And I dare say, every  
25 member that's listed here, to a person, I know hasn't paid for

1 any of this coverage. This has all been free coverage.

2 Q Okay. We go -- a couple of pages over. They're  
3 not numbered. I don't know how to deal with this, but you  
4 come to a series of Nation's Update PSAs, one's four minutes,  
5 one's 90 seconds, et cetera.

6 A Yes, sir.

7 Q Can you find those?

8 A Yes, sir. I have them.

9 Q Is Nation's Update a moniker of yours in terms  
10 of your public service announcements or -- it's the title I  
11 don't understand.

12 A It would evidently have been the title of the  
13 station's choosing, I think, at the time.

14 Q Ah. Okay. That's not your title?

15 A Not that I recall, to the best of my knowledge.  
16 Not that one.

17 Q How do you know that you were on this particular  
18 one?

19 A Well, I did a number of public service  
20 announcements. That's what the PSA, of course, would be,  
21 public service announcement, out at the station. When they  
22 would call, and I remember the different people that would  
23 call me, some young ladies, and I would certainly go out and  
24 do public service announcements with them whenever they  
25 called. And they did call on numerous occasions that I had